

UNITED STATES DISTRICT COURT

Eastern

DISTRICT OF

Wisconsin

Doniel Carter

EXHIBIT AND WITNESS LIST

V.

Erika Watson, et al.

Case Number: 18-cv-727

PRESIDING JUDGE Ludwig					PLAINTIFF'S ATTORNEY Goldman/ Cade	DEFENDANT'S ATTORNEY Flaugar/Polich/Lang
TRIAL DATE (S) November 1 - 5					COURT REPORTER	COURTROOM DEPUTY
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1			X	YES	DOC Investigative Records	
2			X	YES	March through May 2012 Unit Logbooks	
3					Officer Schedules March through May	
4			X	YES	Housing Unit 10 Diagram	
5					DAI Policy 300.00.04 - Cellular Telephones	
6			X	YES	1905 Executive Directive 2 - Employee Discipline	
7					Gransell / Watson Training Records	
8			X	YES	Weideman Tex messages / Weideman Response to Interrogatories	
9			X	YES	Executive Directive 16 - Fraternalization Policy	
10					Executive Directive 7 - Harassment and Hazing	
11			X	YES	Executive Directive 16A - Staff Sexual Assault of Offenders	
12			X	YES	Executive Directive 72 - PREA	
13					DAI Policy 310.00.01 - Inmate Complaints re Staff Misconduct	
14					HS Policy 300_19-Responding to Incidents of Sexual Contact	
15			X	YES	Staff Sexual Misconduct Training Materials	
16			X	YES	Watson Deposition Exhibit 4 - Letter to Carter	
17					FLCI Organization Chart	
18					Medema Deposition Exhibit 1 - Medema drawn map of unit 10	
19					Weideman Personnel File - Discipline for violations of Fraternalization Policy	
20					Weideman Personnel File - selected documents	
21					Weideman Personnel File - Acknowledgement of Fraternalization Policy	
22					Gransell / Watson Personnel File (BS 147-152)	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

EXHIBIT AND WITNESS LIST – CONTINUATION

Doniel Carter vs. Erika Watson, et al.					CASE NO. 18-cv-727
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS AND WITNESSES
23			X	YES	Gransell / Watson Personnel File - selected pages
24					Gransell / Watson Personnel File - Warden letter to Watson after her resignation
25			X	YES	Watson Personnel File - letter of Administrative Leave
26					Watson Personnel File - promotion to Sgt. September 2011
27					Watson Personnel File - fraternization policy exception request
28			X	YES	Watson Personnel File - fraternization policy signed acknowledge
29					Watson Deposition Exhibit 2 - Watson drawn map of unit
30			X	YES	Watson Deposition Exhibit 5 - picture of Carter tattoo on Watson's chest
31			X	YES	June 11, 2012, 10:29 p.m. call
32			X	YES	June 11, 2012, 10:56 p.m. call
33			X	YES	June 12, 2012, 9:01 p.m. call
34			X	YES	June 12, 2012, 9:22 a.m. call
35					October 8, 2012 11:14 p.m. call
36					October 8, 2012 11:29 p.m. call
37			X	YES	Milwaukee Journal Sentinel, August 4, 2017 article: Wisconsin Prison Warden and Deputy suspended
38			X	YES	Executive Directive #43
	2000		X	YES	Securus Certified Call Detail Report
	2001				Securus Business Record Certification
	2001		X	YES	Parts 1-9 Calls
	2002		X	YES	Visitor List and History
	2003		X	YES	DAI Investigation - Gransell
	2003				Part 1 - Audio of Carter Interview
	2004				PI Carter's Resp to Def's RTA, RROGs & RPD
	2005				FLCI Unit 10 Diagram
	2006				Second Amended Complaint (Dkt 22)
	2007				Declaration of Doniel Carter (Dkt 55)
	2008		X	YES	FLCI Inmate Handbook 2008 & 2009 additions